



## March 2008

### Overview

On February 26, 2004, the California Air Resources Board (ARB) adopted the Transport Refrigeration Unit (TRU) Airborne Toxic Control Measure (ATCM) and directed staff to closely monitor progress and development of emissions control technology as it applies to TRUs and TRU generator set emission standards set forth in the TRU ATCM. The Board further directed staff to report on the feasibility of complying with the standards in the time specified in the regulation. The rulemaking became effective December 10, 2004, and was codified under title 13 California Code of Regulations (CCR), section 2477.

### U.S. EPA Waiver

On March 28, 2005, ARB requested the U.S. Environmental Protection Agency (U.S. EPA) to grant a waiver of preemption under the federal Clean Air Act. The ARB continues to be hopeful that U.S. EPA will issue the authorization in the very near future. Compliance with the first phase of implementation of the in-use emission standards is not required by TRU owners and operators until December 31, 2008. By that time, ARB fully expects that EPA will have granted authorization to California. Consistent with federal law, ARB will not undertake any enforcement action against TRU owners and operators for noncompliance with the in-use emission standards until it receives the requested authorization. Pending the EPA decision, ARB will enforce all other requirements of the regulation (e.g. Facility Report, ARB Identification Number, and Operator Report).

### Technology Review

Staff has been tracking diesel emission control strategy (DECS) manufacturers' efforts to develop and demonstrate DECS for TRUs and TRU generator sets. Staff conducted technology review workshops on June 14 and September 12, 2007, at ARB headquarters and via webcast and conference call. Meeting materials, including the agenda, slides, and DRAFT Control Option Matrix, are posted on the TRU website at: <http://www.arb.ca.gov/diesel/tru/archive.htm>. Staff believes there will be adequate compliance options available in time for compliance with this regulation and recommends owners take early, proactive steps to comply.

### Verified Diesel Emission Control Strategies (VDECS)

Staff has processed DECS for TRUs through the Verification Procedure, Warranty, and In-Use Compliance Requirements for In-Use Strategies to Control Emissions from Diesel Engines (title 13, CCR, sections 2700 through 2710). News about VDECS that can be used to retrofit TRUs is posted on ARB's TRU website at: <http://www.arb.ca.gov/diesel/tru.htm>. As of March 2008, one Level 2 (meets the Low-Emission TRU In-Use Performance Standard (LETRU)) VDECS and one Level 3 (meets LETRU and the more stringent Ultra-Low-Emission TRU In-Use Performance Standard (ULETRU)) VDECS have been verified. For details, please see the Executive Orders on ARB's Verification website at: <http://www.arb.ca.gov/diesel/verdev/level2/level2.htm> for Level 2 and <http://www.arb.ca.gov/diesel/verdev/level3/level3.htm> for Level 3. Applications for additional VDECS have been submitted.

### Facility Reports

Facility Reports for "large" facilities were due on January 31, 2006. Large facilities have 20 or more loading spaces serving refrigerated storage areas. ARB is currently conducting enforcement action against facilities that failed to report on time.

### Operator Requirements

The LETRU and ULETRU In-use Performance Standards apply to all TRUs that operate in California on a phased compliance schedule, beginning December 31, 2008. Staff believes there will be sufficient compliance options available in time for compliance. Compliance deadline extensions are not included in the TRU ATCM. Operator reports and ARB Identification Number applications are due to ARB by January 31, 2009. Hardcopy forms will be available by November 2008 for mail-in submittals. Electronic forms will also be available through the TRU website for online submittals by November 2008.

### Compliance Assistance Documents

Compliance assistance materials are available at the ARB's TRU website at: <http://www.arb.ca.gov/diesel/tru.htm>. "TRU Brochure #2" and "TRU ATCM Tutorial" are available in English and Spanish. Staff recently revised the documents titled "How do I Comply with the TRU ATCM?" and "Frequently Asked Questions and Guidelines for the TRU ATCM".

### For More Information

Past TRU ATCM Status Updates are available through the archive link of the TRU website. If you have questions, please call ARB's toll-free TRU Help Line at 1-888-878-2826 (1-888-TRU-ATCM), email Rod Hill at: [rhill@arb.ca.gov](mailto:rhill@arb.ca.gov) or call Richard Boyd at 916.322.8285 (e-mail: [rboyd@arb.ca.gov](mailto:rboyd@arb.ca.gov)). Visit ARB's TRU web site at <http://www.arb.ca.gov/diesel/tru.htm>. Regulatory documents may be viewed and downloaded from <http://www.arb.ca.gov/regact/trude03/trude03.htm>.

If you are handicapped, you may obtain this document in an alternative format. Contact ARB's ADA Coordinator at (916) 322-4505 (voice); (916) 324-9531 (TDD, Sacramento area only); or (800) 700-8326 (TDD, outside Sacramento).